



# HRV

## HASTINGS RANCH VINEYARD

"in the heart of the Adelaida"

December 31, 2010

Electronically Submitted to: [AgOrder@waterboards.ca.gov](mailto:AgOrder@waterboards.ca.gov)  
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Jeffrey S. Young, Chairman of the Board  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: California Regional Water Quality Control Board, Central Coast Region Draft Order No. R3-2011-0006 ("Draft Ag Order"), dated November 2010 Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands

Dear Honorable Chairman Young:

I would, on behalf of Hastings Ranch Vineyard, make a few comments regarding the above referenced proposals.

- 1) Tiered-Approach: I believe that the tiered approach is a mistake as proposed and should be based upon an actual probable cause for pollution. Our operation, by itself, does not automatically create such a situation.
- 2) Incentives: Our vineyards utilizes deficit irrigation practices, drip tubing, water to root technology, drip irrigation and soil moisture calibrations and These practices should be encouraged and incentives given to maximize such practices that serve to minimize water quality degradation
- 3) All dischargers, including Tier 1, are subject to: Receiving Water Monitoring and Groundwater Well Reporting:

Receiving Water Monitoring: Dischargers who do not cause tailwater, as is the case for vineyards, should not be subject to receiving water monitoring.

Groundwater Well Reporting: The requirements for well water monitoring go beyond what is necessary to carry out the order to address pesticides, sediment, and nutrients associated with agricultural discharges. We have several wells and it does not make any sense in our situation that monitoring the depth to groundwater address these issues. We are not located on an aquifer and as such, the suggestion of groundwater well reporting makes no sense in this and many other situations. ? It may be impossible to measure depth to groundwater due to clearances in the well without pulling the pump and adding a sounding tube. This could add substantial cost for compliance without any justification for this requirement. Depth to groundwater monitoring should be eliminated from the order.

Any well testing should be associated specifically to the constituents in question. Additionally, this information should not be submitted to the Control Board for public record. Particularly, if you are not contributing to the concerns meant to be addressed through this order. The groundwater reporting requirements are over-burdensome and unnecessary.

If groundwater testing is deemed legal and necessary under this Order, we support the Ag Alternative approach to targeting water well testing to the constituents in question by limiting testing to one primary well; the constituents for testing only nitrates, TDS or EC, and pH; and keeping results on-farm in the Farm Plan to maintain proprietary information.

I hope you will understand that a successful program is performance-based and provides incentives and opportunities to improve water quality. Arbitrary factors such as operational size and location; unnecessary requirements; burdensome paperwork; and limited resources to manage and enforce does not provide any benefits towards improving water quality.

A longer term approach to improve water quality beyond 5 year increments should be sought. Water quality degradation did not occur overnight and cannot be expected to be solved in a short time horizon without creating negative and unintended consequences to the agricultural community which serves us.

It is our view that the first 5 year Ag Waiver Program has been a success in collecting data and getting the farming community and regional board to begin talking about solving water quality issues. The next 5 years should encompass a priority-based approach targeting the most extreme issues to build momentum to continue to work collaboratively on water quality concerns.

We support the Agricultural Alternative as an improved approach to addressing water quality concerns. Most particularly, we find the Ag Alternative to be more performance-based and focused on research, education, and extension rather than unnecessary and burdensome paperwork that serve no purpose in improving water quality.

Incentives and education go much farther in addressing the end goal of resource protection than regulation ever could; when people are motivated to do good (particularly by their peers), they will do good. We continue to support efforts that are collaborative, performance-based, educational, and well-researched. We respectfully request your Board give your staff very clear direction to work in conjunction with the agricultural community in developing an incentive-based proactive program that will encourage open dialogue and education among stakeholders.

Sincerely,



Newlin Hastings  
Hastings Ranch Vineyard, Paso Robles, Ca

Newlin & Liz Hastings

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